

KENNETH G. EADE (SBN 93774)
keneade@gmail.com
LAW OFFICE OF KENNETH G. EADE
8484 Wilshire Blvd., Suite 515
Beverly Hills, CA 90211
Telephone: (323) 782-8802
Fax: (323) 704-3539

Attorney for Plaintiffs
WILCO FINANCIAL SERVICES CORP.,
STEPHEN WILSHINSKY,
and CHARLOTTE WILSHINSKY

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

WILCO FINANCIAL SERVICES
CORPORATION, *et al.*,

Plaintiffs,

v.

HALBERD CORPORATION, *et al.*,

Defendants.

Case No. 2:12-cv-10041 JEM

**STIPULATION RE DISMISSAL OF
DEFENDANTS**

Date: None

Time: None

Courtroom: C, 8th Flr, 312 N. Spring St.

Mag. Judge: John E. McDermott

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs WILCO FINANCIAL SERVICES CORPORATION, STEPHEN WILSHINSKY, and CHARLOTTE WILSHINSKY (collectively "Plaintiffs") and Defendants HALBERD CORPORATION, HENRY LIGOURI and RUEBEN LOWING ("Defendants") (collectively "Parties") as follows:

1. That the action as against Defendants HENRY LIGOURI and RUEBEN LOWING be dismissed with prejudice; and

2. That the action as to Defendant HALBERD CORPORATION be dismissed without prejudice.

3. Plaintiffs and Defendant HALBERD CORPORATION stipulate and agree that any and all claims that Plaintiffs may have against Defendant HALBERD CORPORATION are preserved and shall be brought in Bankruptcy Court.

DATED: May 15, 2015

/s/ Kenneth G. Eade
KENNETH G. EADE (SBN 93774),
Attorney for Plaintiffs

LARRY L. NASH (SBN 51227),
Attorney for Defendants Ligouri and Lowing

ERIC W. BERRY (*Admitted Pro Hac Vice*)
Attorney for Defendants

ERIC BENSAMOCHAN (SBN 255482),
Attorney for Defendant Halberd Corporation

2. That the action as to Defendant HALBERD CORPORATION be dismissed without prejudice.
3. Plaintiffs and Defendant HALBERD CORPORATION stipulate and agree that any and all claims that Plaintiffs may have against Defendant HALBERD CORPORATION are preserved and shall be brought in Bankruptcy Court.

DATED: May 15, 2015

/s/ Kenneth G. Eade

KENNETH G. EADE (SBN 93774),
Attorney for Plaintiffs

LARRY L. NASH (SBN 51227),
Attorney for Defendants Ligouri and Lowing


ERIC W. BERRY (Admitted Pro Hac Vice)
Attorney for Defendants

ERIC BENSAMOCHAN (SBN 255482),
Attorney for Defendant Halberd Corporation

2. That the action as to Defendant HALBERD CORPORATION be dismissed without prejudice.
3. Plaintiffs and Defendant HALBERD CORPORATION stipulate and agree that any and all claims that Plaintiffs may have against Defendant HALBERD CORPORATION are preserved and shall be brought in Bankruptcy Court.

DATED: May 15, 2015

/s/ Kenneth G. Eade

KENNETH G. EADE (SBN 93774),
Attorney for Plaintiffs

LARRY L. NASH (SBN 51227),
Attorney for Defendants Ligouri and Lowing

ERIC W. BERRY (Admitted Pro Hac Vice)
Attorney for Defendants



ERIC BENSAMOCHAN (SBN 255482),
Attorney for Defendant Halberd Corporation

Wilco Fin'l Svcs Corp, et al. vs. Halberd Corp. et al.

USDC – CA Central Dist., Case No. 2:12-cv-10041 JEM

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action, my business address is Law Office of Kenneth G. Eade, 8484 Wilshire Blvd., Suite 515, Beverly Hills, California 90211.

On May 15, 2015, I served the foregoing documents described as:

STIPULATION RE DISMISSAL OF DEFENDANTS; PROPOSED ORDER

on the parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

See attached Service List.

☒ **BY CM/ECF NOTICE OF ELECTRONIC FILING:** I caused said document(s) to be served by means of this Court's electronic transmission of Notice of Electronic Filing through the Court's transmission facilities, to the parties and/or counsel who are registered CM/ECF Users as indicated in the Service List obtained from this Court.

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed this 15th day of May, 2015, at Palmdale, California.

/s/ Nichelle Guzmán
NICHELLE GUZMAN

Wilco Fin'l Svcs Corp, et al. vs. Halberd Corp. et al.

USDC – CA Central Dist., Case No. 2:12-cv-10041 JEM

SERVICE LIST

Counsel for Defendants LIGOURI & LOWING

Larry L. Nash
Law Offices of Larry L. Nash
19355 Business Center Drive, Ste. 3
Northridge, CA 91324
Email: larrynashlaw@pacbell.net
Tel: (818) 993-8522
Fax: (818) 993-9427

Counsel for Defendant HALBERD CORP.

Eric Bensamochan
The Bensamochan Law Firm, Inc.
20501 Ventura Blvd., Suite 130
Woodland Hills, CA 91364
Email : eric@eblawfirm.us
Tel : 818-574-5740
Fax : 818-961-0138

Co-Counsel for Defendants LIGOURI & LOWING

Eric W. Berry
Berry Law PLLC
5 Columbus Circle, 8th Floor
New York, NY 10019
Email: berrylawpllc@gmail.com
Tel: (212) 355-0777
Fax: (212) 750-1371